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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

GILBERT GUZMAN,

Plaintiff,

v.

SPACE EXPLORATION
TECHNOLOGIES CORP., a
Delaware corporation; and DOES 1
through 60, inclusive,

Defendants.

Case No.: 2:15-cv-06000-R-RAO

**STIPULATION TO CONTINUE
TRIAL AND PRE-TRIAL
DEADLINES**

Plaintiff Gilbert Guzman (“Plaintiff”) and Defendant SpaceX (“Defendant”) hereby submit this Stipulation to Continue Trial and Pre-Trial Deadlines pursuant to Local Rules (“L.R.”) 16-9 and 40-1 and respectfully request that the Court issue an order granting this Stipulation pursuant to L.R. 40-1.2.

STIPULATION TO CONTINUE TRIAL AND PRE-TRIAL DEADLINES

WHEREAS, on October 23, 2015, the Court issued an Order (In Chambers) Setting Pre-Trial & Trial Dates (Doc. 11) that established the following trial date and pre-trial deadlines in this case:

Deadline to file and serve Memoranda of Fact and Law, and Exhibit and Witness Lists; Discovery Cut-Off	March 28, 2016
Deadline to lodge Pre-Trial Conference Order	April 11, 2016
Final Pre-Trial Conference	April 18, 2016
Trial	May 17, 2016

WHEREAS, Defendant’s counsel has a trial scheduled to begin on May 6, 2016 in another matter, captioned, *Jessica Casabella v. Sutter West Bay Hospitals*, Case No. SCV-255230 (Sonoma County Superior Court).

WHEREAS, Plaintiff’s counsel has a trial scheduled to begin on May 17, 2016 in another matter, captioned, *Janson, et al. v. Local Waste Management, et al.*, Case No. 8:14-cv-01787-JLS-DFM (United States District Court, Central District of California).

WHEREAS, the parties disclosed these existing trial dates in their Amended Early Meeting Report / Joint Rule 26(f) Report (Doc. 10) filed September 28, 2015.

WHEREAS, the parties agree that they will not be able to adequately prepare for trial in this case if the *Casabella* and *Janson* cases proceed to trial as planned.

1 WHEREAS, the parties further agree that the earliest available date for trial
2 in this case given their counsel's respective existing trial calendars is September 6,
3 2016.

4 WHEREAS, Plaintiff has indicated he intends to bring a motion for remand,
5 which Defendant will oppose, and Defendant agrees not to use this Stipulation as a
6 basis for arguing that this action is not subject to remand.

7 NOW, WHEREFORE, for the foregoing reasons and for good cause shown,
8 the parties hereby stipulate to the following continued trial date and pre-trial
9 deadlines:

11 Deadline to file and serve Memoranda of Fact and Law, 12 and Exhibit and Witness Lists; Discovery Cut-Off	July 18, 2016
13 Deadline to lodge Pre-Trial 14 Conference Order	August 1, 2016
15 Final Pre-Trial Conference	August 8, 2016
16 Trial	September 6, 2016

17 Alternatively, the parties hereby stipulate to whatever continued trial date
18 and pre-trial deadlines the Court deems convenient.

19 Finally, to effectuate this stipulation, the parties respectfully request that the
20 Court enter the proposed order submitted herewith.

21 Respectfully Submitted,

22 Dated: November 12, 2015

23 KESLUK, SILVERSTEIN & JACOB,
24 P.C.

25 /s/ Michael G. Jacob

26 Michael G. Jacob
27 Attorneys for Plaintiff GILBERT
28 GUZMAN

1 Dated: November 12, 2015

FOX ROTHSCHILD LLP

2
3 /s/ Lee B. Szor

4 Lee B. Szor

Attorneys for Defendant SPACEX